



July 28, 2011

CallWave, Inc. appreciates the goal of policymakers to protect businesses and customers from fraud committed through their local phone bill. We applaud your efforts, and we look forward to learning more about new enhancements that are being considered to the industry's practices.

CallWave was founded in 1998 and is publicly traded (OTC: CLWA). We provide an array of communications solutions that allow residential end users to communicate and collaborate from anywhere and from any device. We serve residential homes across the country, 31,995 of which in 2010 had our services billed directly to their local telephone bill.

Our perspective on billing through a local phone bill is multifaceted. In delivering our Internet and communications solutions, CallWave leverages the capabilities of Liberty Telecomm, a wholly owned Competitive Local Exchange Carrier (CLEC). We partner with a third-party billing service to ensure that charges are aggregated onto phone bills properly, and that regular checks are done to confirm that customer service continues to meet very stringent standards. While our industry has implemented many important processes to protect consumers, we are very interested in new ideas of how we as an industry can further improve our existing checks and balances.

Unethical businesses who are responsible for phone cramming are a scourge on our industry and must be weeded out. We ask that you consider measures that will punish such bad actors, so that businesses like ours can continue to serve our customers with the convenience and excellent service they expect.

Sincerely,

Dipak Joshi
Controller